

DATA PROCESSING AND PROTECTION POLICY

In this document you will find information about the terms of processing and protection of personal data that you provide to Dyma Media Solutions s. r. o. ("Dyma Media") when you visit Dyma Media's website, use Dyma Media's services or in other cases where we obtain your personal data. Dyma Media is the controller of this personal data and guarantees that it is always handled in accordance with the legal order of the Czech Republic, in particular Act No. 110/2019 Coll., on the processing of personal data, and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as the "GDPR".

This privacy policy contains all important information about how we handle your personal data, what protection we guarantee for it and what rights you have in relation to the processing of your personal data. At the same time, this document fulfills the information obligation under Article 13 of the GDPR.

BASIC INFORMATION

Personal data controller

The administrator of your personal data is Dyma Media Solutions s.r.o., with registered office at Kurzova 2222/16, Stodůlky 155 00 Praha 5, ID 21259666.

Data Protection Officer

As we process a very limited amount of personal data, we are not obliged to appoint a data protection officer.

Purpose and legal reason for processing your personal data

If you are our client or if you subscribe to our website, we use your email to send you articles and newsletters, i.e. commercial communications about our activities, services or news from the world of online marketing. In this way, we can use your email address on the basis of Act No. 480/2004 Coll. The legal basis for processing your personal data in this case is our legitimate interest, and in the case of newsletter subscriptions, your consent to this processing. You can unsubscribe from articles and newsletters at any time via a link sent within each newsletter.

We use data of a technical nature, such as network identifiers, to better present the content of our website. The legal basis for processing this personal data is our legitimate interest. We can only store cookies on your device with your consent, which is expressed by the settings of your internet browser (i.e. allowing or disallowing the storage of cookies).

If you have entered into any contractual relationship with us, we process your personal data for the purpose of fulfilling our obligations under the contract. For this purpose, we primarily

process your identification data, contact data (address, e-mail, telephone number), payment data and data related to the performance of the contract. The legal basis for the processing is the performance of the contract. We also process some personal data in order to fulfil the obligations imposed on us by applicable law, e.g. the obligation to keep accounts and archive accounting records.

If you enquire about a campaign with us or ask us for a consultation, we process your personal data for the purpose of processing your request and for the purpose of communicating with you. For this purpose, we process your identification and contact data provided in the request and also other facts you provide us with in the request. The legal basis for the processing is our legitimate interest or, where applicable, the procedure for concluding a contract at your request.

We are also entitled to process your personal data in order to protect our rights in the event of any dispute relating to the services we provide.

Is processing possible without your consent?

We may process your personal data without your consent in the above cases. The possibility of processing your personal data on the basis of the above-mentioned reasons arises directly from the applicable legal regulations; your consent is therefore not required for this processing.

Processing based on consent, withdrawal of consent

We do not process your personal data on the basis of your consent, with the exception of sending you newsletters upon your request. Should it be necessary to obtain your consent for the processing of your personal data (e.g. for the purpose of being able to send you commercial communications from third parties), you will be able to withdraw this consent at any time free of charge. Withdrawal of consent does not affect the possibility to continue processing your personal data on the basis of your consent given prior to withdrawal.

The withdrawal of consent to processing also does not affect our right to process personal data that is processed on the basis of another legal ground, in particular the performance of a contract or the fulfillment of our legal obligations.

Access and transfer of personal data

Only those members of the Dyma Media team who absolutely need your personal data to perform their work have access to your personal data.

We do not pass on your personal data to third parties. Your personal data is not transferred to another country or international organization.

If we use a third party processor to process your personal data, this processing will be governed by a written contract between us and the processor. This contract will contain all the elements required by law.

In the cases provided for by law, we are obliged to transfer your personal data to law enforcement authorities or other state authorities.

Processing period

Your personal data will be processed for as long as the lawful reason for processing lasts. In cases where applicable law requires the processing or archiving of certain personal data, such personal data will be processed for the period of time specified by the applicable law (e.g. accounting and tax records). In the event of a dispute or threatened dispute, your personal data may be processed for the duration of such dispute or for the period during which any rights against you may be exercised (limitation period).

YOUR RIGHTS

In particular, you have the following rights in relation to your personal data:

- The right to request information about whether we are processing your personal data;
- The right to access your personal data;
- The right to request the rectification or completion of your personal data;
- The right to request that we erase your personal data or to request that we limit the scope of processing of your personal data;
- The right to request the transfer of your personal data;
- The right to object to the processing of your personal data;
- The right to lodge a complaint with a supervisory authority, which in the Czech Republic is the Office for Personal Data Protection;
- The right not to have your personal data subject to any decision based solely on automated processing or profiling, provided that the legal conditions for this are met;
- In the event that you give your consent to the processing of your personal data, you have the right to withdraw your consent at any time, in particular in the same way as the consent was given.

In addition to your rights above, we also provide you with the following more detailed information on what your rights are and how you can exercise them:

1/ Right to information and access to personal data

Based on this right, you can ask us at any time to tell you whether we are processing your personal data. If you receive information from us that we are processing your personal data, you have the right to access all the personal data we are processing about you and the right to request a copy of your personal data. We will provide you with this copy free of charge. In the event that you request a copy again, we may charge you a reasonable fee based on the administrative costs we incur.

2/ Right to rectification of your personal data

If you discover that your personal data is inaccurate or out of date, you have the right to ask us to correct it. In this case, we will make the correction without undue delay after you have provided us with the correct personal data.

3/ Right to erasure of your personal data

This right is also known as the right to be forgotten. If you exercise this right with us, we are obliged to delete all your personal data, but only if one of the following conditions is met:

- Your personal data is no longer needed for the purposes for which it was collected or processed;
- You withdraw your consent on the basis of which the data was processed and we have no further legal basis for processing your personal data;
- Your personal data will be processed unlawfully;
- Your personal data must be erased in order for us to comply with an obligation imposed on us by European Union or Czech law.

Your personal data will also not be deleted upon request if:

- Would be contrary to the exercise of the right to freedom of expression and the right to information;
- We would be in breach of an obligation imposed on us by European Union or Czech law;
- It is necessary for the exercise of our legal claims.

If the conditions for the deletion of your personal data are not met, we will inform you of this fact without undue delay and at the same time state the reasons why we cannot comply with your request.

4/ Right to request restriction of the processing of your personal data

If you exercise this right, we are obliged to limit the scope of processing of your personal data. However, we cannot always comply with this request, but only if any of the following reasons are met:

- If you believe that your personal data is inaccurate, we will restrict the processing of your personal data until we have verified this;
- If you believe that we are processing your personal data unlawfully and you refuse to have your personal data erased;
- We no longer need your personal data for processing, but to determine your legal claim, if any;
- You have exercised your right to object to the processing of your personal data and it has not yet been decided whether our legitimate grounds for processing it prevail.

If your requested restriction is lifted, you will be notified by us in due time.

5/ Notification obligation regarding rectification, erasure or restriction of the processing of your personal data

If we have disclosed your personal data to other entities, we are obliged to notify them of any rectification, erasure or restriction of processing of personal data that has been made in relation to your personal data. We are not obliged to comply with this obligation if it would be

impossible or would require disproportionate effort for us to do so. If you request it, we will provide you with a list of recipients who have been notified in relation to your personal data.

6/ Right to data portability

You have the right to ask us for your personal data in a structured, commonly used and machine-readable format. In such a case, we will provide you with your personal data without undue delay. You have the right to transfer this data to another controller. If technically feasible, you have the option to request that we transfer your personal data directly to another controller.

7/ Right to object

You have the right to object to the processing of your personal data at any time if your personal data is processed for direct marketing purposes. If you do so, we will no longer process your personal data for direct marketing purposes.

8/ Rights relating to automated individual decision-making and profiling

You have the right to request that your personal data not be processed by automated means or by profiling. Please be advised that Dyma Media does not carry out processing by automated means or profiling.

Automated processing means processing by computer technology, without human intervention. Profiling is a certain form of processing of your personal data, which is also carried out by automated means and is used to evaluate a certain matter, for example to evaluate personal preferences, economic situation, etc.

9/ Obligation to report security incidents

Your personal data is processed and stored using appropriate technical and security measures. Our systems are properly secured and security measures are regularly checked and updated to provide your personal data with the highest possible guarantee of protection.

If, despite the measures taken, the security of your personal data is breached and at the same time this could pose a high risk to you, you will be notified without undue delay. We will also inform you of the likely consequences of such a breach, including the remedial measures taken.

We further inform you that we are also obliged to report any breach that could pose a risk to your rights and freedoms to the Data Protection Authority.

COOKIES

Cookies are small text files that are stored on your computer or device when you visit our website. We can recognise these cookies on subsequent visits so that we remember you and can better personalize the content of our website. You can change the option to store cookies in your internet browser settings. If you have enabled the storage of cookies in your

settings, this setting is deemed to be your consent to the use of cookies. You can delete cookies from your computer or device. However, if you delete our cookies or prohibit the storage of cookies, you may not be able to access certain areas of our website or certain functions that depend on the storage of cookies.